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15 *Attorneys for Defendants Tesla, Inc., Elon Musk,*

16 *Brad W. Buss, Robyn Denholm, Ira Ehrenpreis,*

*Antonio J. Gracias, James Murdoch, Kimbal Musk,*

17 *And Linda Johnson Rice*

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 SAN FRANCISCO DIVISION

21  
22  
23 IN RE TESLA, INC. SECURITIES  
LITIGATION

Case No. 3:18-cv-04865-EMC

24 **[PROPOSED] ORDER GRANTING**  
25 **DEFENDANTS' ADMINISTRATIVE**  
26 **MOTION TO SEAL**

1 THE COURT, having considered the Administrative Motion to File Under Seal  
2 Documents in Support of the Reply Memorandum in Support of Defendants’ Motion to Transfer  
3 Venue filed by Defendants Tesla, Inc., Elon Musk, Brad W. Buss, Robyn Denholm, Ira  
4 Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (together,  
5 “Defendants”), the Declaration of Michael T. Lifrak and accompanying exhibits, and all other  
6 filings in this case, has found:

7 (1) There exist compelling reasons to seal the unredacted Memorandum and Exhibit A that  
8 overcome the right of public access to the information they contain;

9 (2) A substantial probability exists that the overriding interest will be prejudiced if the  
10 unredacted Memorandum and Exhibit A are not sealed;

11 (3) The proposed sealing is narrowly tailored; and

12 (4) No less restrictive means exist to achieve the overriding interest (CRC 2.550(d));

13 **HEREBY ORDERS THAT:**

14 Because the unredacted Memorandum and Exhibit A contain material that is sealable  
15 pursuant to Northern District of California Civil Local Rule 79-5, Defendants’ Administrative  
16 Motion to Seal is hereby **GRANTED**.

17 **IT IS SO ORDERED.**

18 DATED: , 2023  
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21 By \_\_\_\_\_  
22 Honorable Edward M. Chen  
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